

# Response to Defendant's Position on

## Proposed Order for Back Pay and Continued Salary (Doc. 41)

Willie Lee HavMmeri,  
Plaintiff  
vs.  
Methodist Health Systems,  
Defendant

Case No. 3:22-cv-00594-E-BT

Summary: Order for Back Pay and Continued Salary as Damages for Motion of Summary Judgement (Doc 35).

**Should The Motion of Summary Judgment be granted (and it should be by Rule 56), I would like the Order for Back Pay and Continued Salary to be granted/awarded in Damages Sought.**

With the Order of Back Pay and Continued Salary, I as the Plaintiff can afford to fund my request for the 4 remaining orders proposed by me on the docket. (Documents 26, 27, 29 & 30)

My request for Appointment of Counsel, Email History, Business Training & Medical Benefits can all be funded by myself should I be awarded my years of lost wages and continued salary moving forward. I would look to reclaim these expenses from the Defendant after this case is settled in court or through settlement.

If the Order of Back Pay and Continued Salary (Doc. 28) is granted as damages for an Order of Summary Judgment, I ask the Court to please provide me with detailed instructions on how to properly format and draft the proposed order to the Court's liking. If the Court would like to draft and grant its own custom Summary Order, I leave it to the Judge's discretion.

I thank the Courts for their consideration on these matters and I'm looking forward to Justice being administered.

Respectfully submitted, November 22th 2022

By: \_\_\_\_\_/s/ Willie HavMmeri

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